## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

Civil Action No. 05-30046-KPN

ALICE W. HALPIN,

Plaintiff,

v.

RDC OF CONNECTICUT, INC., R.D. CLARK AND SONS, INC., KATELAND LEASING, INC., PINNACLE TRANSPORTATION, INC. and CHINA GROVE TRANSPORT, INC.,

Defendants.

and

RDC OF CONNECTICUT, INC.,

Plaintiff-in-Counterclaim,

v.

ALICE W. HALPIN, INDIVIDUALLY and as EXECUTRIX OF THE ESTATE OF RONALD J. HALPIN,

**Defendants-in-Counterclaim.** 

JOINT MOTION FOR COURT'S <u>DELAY</u> IN ENTRY OF JUDGMENT

The parties move that the Court postpone entering judgment in the above-captioned matter for one week to allow parties time to execute the amended lease and settlement agreement. In support of the within Motion, the parties state the following:

1. Pursuant to the Court's deadline the parties filed a Proposed Judgment Including Declaratory Relief, today, July 20, 2006.

- 2. The parties have not finalized the amended lease and settlement agreement and need some additional time to complete that process.
- The entry of judgment is dependent upon the parties reaching final agreements as 3. to these matters.

WHEREFORE, the parties request that the Court refrain from entering the judgment as proposed for one week, until July 27, 2006.

Respectfully submitted,

ALICE W. HALPIN By her attorney,

RDC OF CONNECTICUT, INC. By its attorney,

/s/ Lisa McCormack

Robert Murphy, Esq. BACON & WILSON, PC 33 State Street Springfield, Massachusetts 01103 (413) 781-0560

Lisa M. McCormack, Esq. (BBO# 638735) CAIN, HIBBARD, MYERS & COOK, PC 66 West Street Pittsfield, Massachusetts 01201

(413) 443-4771 lmccormack@cainhibbard.com

Dated: July 20, 2006